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Attorneys for Defendants
 SLM CORPORATION and SALLIE MAE, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANDREW BRADSHAW, TANIF)	Case No. CV-12-6376-JSW
STEPHENSON, ADAM CORRIVEAU, and)	
JESELL GONZALEZ, on behalf of themselves)	[Assigned to the Hon. Jeffrey S. White]
and similarly situated individuals,)	
)	STIPULATION AND [PROPOSED]
Plaintiff,)	ORDER EXTENDING TIME FOR
)	DEFENDANTS TO RESPOND TO
v.)	PLAINTIFFS' SECOND AMENDED
)	COMPLAINT
SLM CORPORATION, a Delaware)	
corporation; and SALLIE MAE, INC., a)	Action Filed: December 17, 2012
Delaware corporation,)	
)	[Local Rule 6-1(b)]
Defendants.)	
)	[Declaration of Joann M. Nguyen filed
)	concurrently]
)	

WHEREAS, on December 17, 2012, plaintiffs Andrew Bradshaw, Tanif Stephenson, Adam Corriveau and Jesell Gonzalez (“Plaintiffs”) filed their Class Action Complaint for Equitable, Declaratory and Injunctive Relief and Damages For (1) Aiding and Abetting Fraud, (2) Mistake of Fact, (3) Unjust Enrichment, (4) Violations of the California Unfair Competition Law, and (5) Violations of the Oklahoma Consumer Protection Act (“Complaint”) on December 17, 2012 (Docket No. 1);

WHEREAS, Plaintiffs filed their First Amended Class Action Complaint (“FAC”) on February 4, 2013 (Docket No. 11);

WHEREAS, the Court granted a motion to dismiss the FAC with leave to amend (Docket No. 31);

WHEREAS, Plaintiffs prepared a Second Amended Class Action Complaint (“SAC”) that included two additional claims and re-plead the claims that were the subject of the FAC, and on November 15, 2103, filed a motion for leave to amend to add the additional claims and attached the draft SAC;

WHEREAS, Defendants opposed the motion for leave to amend the SAC on grounds that the additional claims, as pled, were futile;

WHEREAS, on February 2, 2014, the Court granted the motion for leave to amend (Docket No. 41);

WHEREAS, pursuant to the Court’s Order issued on February 2, 2014, Plaintiffs filed their SAC on February 11, 2014. (Docket No. 42);

WHEREAS, Defendants’ response to the SAC currently is due on February 28, 2014;

WHEREAS, due to Defendants’ counsel’s vacation schedule and Defendants’ need to evaluate the allegations, Plaintiffs have agreed to grant Defendants an extension of time to file their response to the SAC up to and including March 31, 2014;

WHEREAS, pursuant to Civil Local Rules 6-1(b) and 6-2, the parties may request an order changing a deadline that would extend deadlines set forth in the Local Rules or Federal Rules;

WHEREAS, this Stipulation is made in good faith and not for purposes of delay; and

WHEREAS, good cause exists for the foregoing modifications to the case schedule to provide the Defendants with additional time to prepare their response due to Defendants' counsel's vacation schedule.

IT IS HEREBY STIPULATED by and between the parties, through their respective counsel of record that Defendants' response to the SAC shall be filed and served by March 31, 2014.

Dated: February 24, 2014

STROOCK & STROOCK & LAVAN LLP
LISA M. SIMONETTI
DAVID W. MOON
JOANN M. NGUYEN

By: /s/ Joann M. Nguyen
Joann M. Nguyen

Attorneys for Defendants
SLM CORPORATION and SALLIE MAE, INC.

Dated: February 24, 2014

WOLF LEGAL, P.C.
ADAM B. WOLF
TRACEY DEMMON BERGER

GREENFIELD SULLIVAN DRAA & HARRINGTON LLP
CHRISTOPHER D. SULLIVAN
MATTHEW R. SCHULTZ

By: /s/ Adam B. Wolf
Adam B. Wolf

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ATTESTATION

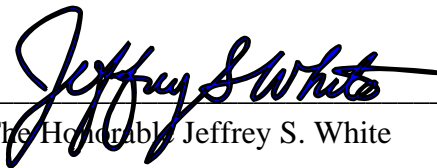
I, Joann M. Nguyen, am the ECF user whose identification and password are being used to file this Stipulation. I hereby attest that Adam B. Wolf has concurred in this filing.

/s/ Joann M. Nguyen
Joann M. Nguyen

PROPOSED ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: February 26, 2014


The Honorable Jeffrey S. White

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